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December 24, 2024

VIA ECF

The Honorable Dale E. Ho
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 905
New York, New York 10007

Re: United States v. Adams, 24 Cr. 556 (DEH)

Dear Judge Ho:

I represent Mayor Eric Adams in the above-captioned matter. I write pursuant to Rule 9 of the Court's Individual Rules and Practices in Criminal Cases regarding Mayor Adams's renewed motion for an evidentiary hearing and sanctions filed earlier today on the public docket with redactions. Although documents "relevant to the performance of the judicial function and useful in the judicial process" are entitled to a presumption of public access, this presumption must be balanced against "competing considerations." *Lugosch v. Pyramid Co. of Onodaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). The information contained in the Spiro Declaration and the redactions to the memorandum of law constitute sensitive information concerning matters occurring before a grand jury, including the identity of a grand jury witness and the substance of the witness's testimony, within the meaning of Rule 6(e) of the Federal Rules of Criminal Procedure. Accordingly, I respectfully request the Court grant leave to: (1) maintain the redactions to the publicly filed memorandum of law; (2) file an unredacted copy of the memorandum under seal; and (3) file the Spiro Declaration under seal.

Respectfully submitted,



Alex Spiro

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